

Jeffrey Willis (NV Bar #4797)
 Erica J. Stutman (NV Bar #10794)
 Gregory Marshall (*Admitted Pro Hac Vice*)
 Hayley J. Cummings (NV Bar #14858)
 Jacob C. Jones (*Admitted Pro Hac Vice*)
 SNELL & WILMER L.L.P.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
 Telephone: (702) 784-5200
 Facsimile: (702) 784-5252
 E-Mail: jwillis@swlaw.com
 estutman@swlaw.com
 gmarshall@swlaw.com
 hcummings@swlaw.com
 jcjones@swlaw.com
*Attorneys for Defendants Wells Fargo Bank, N.A.,
 Katherine Darrall*

**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

MAURICIO JASSO, individually and in his
 capacity as the Court-Appointed Receiver of
 JAMA INVESTMENT GROUP, INC.,
 GUILLERMO SESMA, SYLVIA MARTINEZ
 SALINAS, BELISARIO JASSO BALDINI,
 JAVIER RAMIREZ LARES, ANTONIO
 BACHALANI, RODRIGO FERNANDEZ,
 JUAN ROMERO, and BERNARDO
 VILLACECIAS,

Plaintiffs,

v.

WELLS FARGO BANK, N.A., KATHERINE
 DARRALL, and JOSE RICO,

Defendants.

Case No. 2:20-cv-00858-CDS-BNW

**WELLS FARGO BANK, N.A. AND
 KATHERINE DARRALL’S MOTION
 FOR ORDER SHORTENING TIME ON
 DEFENDANTS WELLS FARGO
 BANK, N.A. AND KATHERINE
 DARRALL’S MOTION TO EXTEND
 REMAINING DEADLINES IN CASE
 MANAGEMENT PLAN**

Pursuant to Federal Rules of Civil Procedure 7(b) and Local Rule IA 6-1 for the District of
 Nevada, Defendants Wells Fargo Bank, N.A. and Katherine Darrall (together, ‘Defendants’)
 respectfully request an Order Shortening Time to hear their Motion to Extend Remaining Deadlines
 in Case Management Plan, filed today at ECF No. 336 (“Motion”). This Request is based upon the
 pleadings and papers on file herein, the Declaration of Erica Stutman attached as **Exhibit 1**, and
 the points and authorities submitted herewith.

MEMORANDUM OF POINTS AND AUTHORITIES

In their Motion, Defendants respectfully request that the Court extend the March 10, 2023 deadline for Defendants to serve their expert disclosures and reports, along with the remaining expert and dispositive motion deadlines that follow. As discussed in more detail in the Motion, Defendants request an extension of this deadline because Defendants and their experts cannot reasonably meet the March 10 deadline despite their diligence. This is because Plaintiffs disclosed two expert reports, one of which is a massive, **1,150 page expert report**, which includes 433 pages of text with opinions, and 717 pages of exhibits, nearly all of which were created by Plaintiffs' experts. In addition, Plaintiffs recently made supplemental document productions to Defendants, despite such productions being very long overdue, and have further warned of another document production to come. Defendants did not and could not have reasonably anticipated such a massive production of expert opinion evidence and documents when agreeing to the original expert disclosure schedule, which provided a mere forty (40) days for Defendants to provide responsive expert opinions.

An order shortening time to decide Defendants' Motion is necessary because if filed in the normal course, Plaintiffs' deadline to respond to the Motion will not be until March 2, 2023, with Defendants' reply due on March 9, 2023, leaving no time for the Court to consider the briefing and enter a ruling within a meaningful period before the March 10, 2023 deadline.

Defendants' Motion is reasonable and would typically be agreed upon by stipulation between the parties without any dispute and without involving the Court. The other defendant, Jose Rico, does not plan to oppose Defendants' Motion. However, Plaintiffs have stated they will contest Defendants' Motion.

///

///

///

///

///

1 Accordingly, Defendants seek an order from the Court shortening the briefing period on the
2 Motion. Wells Fargo proposes a response period of three business days and a reply period of two
3 business days.

4
5 DATED this 16th day of February 2023.

SNELL & WILMER L.L.P.

s/Erica J. Stutman

Jeffrey Willis

Nevada Bar No. 4797

Erica J. Stutman

Nevada Bar No. 10794

Hayley J. Cummings

NV Bar #14858

Jacob C. Jones (*Admitted Pro Hac Vice*)

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89169

*Attorneys for Wells Fargo Bank, N.A. and
Katherine Darrall*

ORDER

14 IT IS ORDERED that ECF No. 337 is GRANTED.
15 Plaintiffs' response to ECF No. 336 is due by
16 2/21/2023. No reply will be considered.

IT IS SO ORDERED

DATED: 11:11 am, February 17, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2023, I electronically transmitted **WELLS FARGO BANK, N.A. AND KATHERINE DARRALL'S MOTION FOR ORDER SHORTENING TIME ON DEFENDANTS WELLS FARGO BANK, N.A. AND KATHERINE DARRALL'S MOTION TO EXTEND REMAINING DEADLINES IN CASE MANAGEMENT PLAN** to the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system for filing. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Mark J. Connot
 Rex D. Garner
 FOX ROTHSCHILD LLP
 One Summerlin
 1980 Festival Plaza Dr., Suite 700
 Las Vegas, Nevada 89135
mconnot@foxrothschild.com
rgarner@foxrothschild.com

Attorneys for Defendant Jose Rico

Anthony P. Sgro
 Colleen N. Savage
 SGRO & ROGER
 720 S. 7th Street, 3rd Floor
 Las Vegas, Nevada 89101
tsgro@sgroandroger.com
csavage@sgroandroger.com

Courtney Caprio
 Jeffrey W. Gutchess
 Joanna Niworoski
 AXS LAW GROUP, PLLC
 2121 NW 2nd Avenue, Suite 201
 Miami, Florida 33127
courtney@axslawgroup.com
jeff@axslawgroup.com
joanna@axslawgroup.com
lina@axslawgroup.com
alejandra@axslawgroup.com
Attorneys for Plaintiffs

DATED: February 16, 2023.


 An employee of SNELL & WILMER L.L.P.

INDEX OF EXHIBITS TO WELLS FARGO BANK, N.A. AND KATHERINE DARRALL'S MOTION FOR ORDER SHORTENING TIME ON DEFENDANTS WELLS FARGO BANK, N.A. AND KATHERINE DARRALL'S MOTION TO EXTEND REMAINING DEADLINES IN CASE MANAGEMENT PLAN

EXHIBIT	DESCRIPTION	NO. OF PAGES
1	Declaration of Erica Stutman, Esq. in Support of Wells Fargo Bank, N.A. and Katherine Darrall's Motion for Order Shortening Time On Defendants Wells Fargo Bank, N.A. and Katherine Darrall's Motion to Extend Remaining Deadlines in Case Management Plan	2

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200